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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA : CIVIL B-90-090 (TFGD)
: CRIM. B-86-59 (TFGD)
: :
VS. :
: :
ARIF DURRANI : JUNE 12, 1991

MOVANT'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 6(a), Rules Governing § 2255 Proceedings in the United States District Courts, and Fed. R. Civ. P. 26 et seq., movant Arif Durrani hereby requests that the United States produce the following documents within no more than thirty days from the date leave is granted to serve these requests.

INSTRUCTION AND DEFINITION:

1. These interrogatories shall be deemed continuing, so as to require supplemental answers if further information is obtained between the time the answers are served and the time of trial.
2. If no one employee or agent is competent to answer all the interrogatories, the responses should be separately answered under oath by as many agents of the plaintiff as are necessary.
3. As used herein, the term "document" means the original as well as any copy regardless of origin or location of any typewritten, handwritten, printed or recorded material including,

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DATE: NOV 2007

but not limited, to any book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, handwritten note, working paper, chart, paper, graph, index, tape, disc, data sheet, data processing card, diary, calendar, business records, address and telephone records, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter however produced or reproduced to which you have or have had access or control.

4. As used herein, the term "identify" or "identification" with reference to a document means to state the date, author (and if different the signer or signers), the addressee, document (e.g., letter, memorandum, etc.) and its present or last known location and the name and address of the person having custody or control of such document. If any such document was, but is no longer in your possession or subject to your control, state the disposition made of it, the reason for such disposition and the date thereof, its present location and the name and address of the person having custody or control of such document, with sufficient particularity to request its production.

5. As used herein, the term "you" means you, yourself, the person to whom these interrogatories are addressed or any of your agents, deputies, assignees, partners, associates or any employees,

employers or organizations of which you are a member or an employee, or any person acting on your behalf.

6. Without limitation, a document is deemed to be in your "control" if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof.

7. "Communicate" or "communication" means every manner or means of disclosure, transfer, or exchange, and every disclosure, transfer or exchange of information whether orally or by document or whether face-to-face, by telephone, mail, personal delivery, or otherwise.

8. Use of the term "identify" with reference to an individual person, means to state his full name, present home address, present position and business affiliation or employment. "Identify" as to a communication means to state the date of the communication, the type of communication, the place where such communication was made, the identities of the maker(s) and the receiver(s) of the communication and of each person present when it was made, and the subject matter discussed.

9. The masculine shall include the neuter or feminine gender, unless the context expressly indicates otherwise; the singular includes the plural and vice versa; the present tense includes the past tense and vice versa; and "or" shall be construed either

conjunctively or disjunctively to bring within the scope of these interrogatories any information which might otherwise be construed to be outside their scope.

10. If any of the information requested in answer to the interrogatories propounded herein is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, discs, or core storage) state the form in which it is available and describe the type of computer or other machine required to read the records. If the information requested is stored in a computer, indicate whether there is an existing program which will print the records in the form desired, or if no program exists, whether one could be written.

11. If you do not answer any interrogatory because of a claim of privilege, set forth the privilege claimed, the facts upon which you rely to support the claim of privilege, and identify all documents for which such privilege is claimed.

1. Records of an entity called "Forways," including bank statements and/or cancelled checks, marked as exhibit number EN 0199-358 at Congressional hearings investigating the involvement of officials of the United States Government with selling HAWK missile parts to Iran at any time prior to July 1, 1987.

2. Records, including those in possession of or prepared by the Federal Bureau of Investigation ("FBI") concerning visits or meetings between citizens or representatives of the Islamic Republic of Iran and United States citizens Lt. Col. Oliver North, Richard Secord, Albert Hakim and/or George Cave, in Washington, D.C., on or about July 9, 10 and 11, 1986, and/or September 19, 20 and 21, 1986.

3. Records, including those in possession of the Central Intelligence Agency ("CIA") concerning meetings or discussions between citizens or representatives of Iran and Albert Hakim and/or George Cave in Frankfurt, West Germany on July 25, 1986; in London on August 7, 1986; and in Madrid on August 10, 1986.

4. Records, including those in possession of the Department of Transportation, related in any way to the entry of aircraft into Dulles International Airport directly or indirectly from Istanbul, Turkey, on September 19, 1986.

5. All documents in the possession of or available to the United States Government, including the CIA, FBI and Customs Service, concerning Manuel Pires, a resident of Lisbon, Portugal.

6. Records relating to the entry of Manuel Pires into the United States during June and/or July 1987, including records of the Immigration and Naturalization Service ("INS") and/or the Customs Service.

7. All records of a meeting between Lt. Col. Oliver North and an Iranian exile in the office of United States Senator Jesse Helms on June 27, 1986.

8. All records, including cargo manifests, of a shipment from employees or agents of the United States government to Iran through Madrid, on a carrier known as Race Aviation.

9. All documents relating to or identifying the so-called "Second Channel", including records of a briefing given by Admiral Poindexter of the National Security Council ("NSC") to Avram Nir on September 10, 1986.


10. All records of the sale of HAWK missile system parts from Varian Associates to an entity called Merex, regardless of its address.

11. All records, including court stipulations, concerning the location or whereabouts of Lt. Col. Oliver North from September 1, 1986 to October 15, 1986.

12. All reports of the Office of the Inspector General or other offices within the Department of the Army, from January 1, 1985 to December 31, 1987, concerning the sales of or the termination of sales of HAWK missile system parts to the CIA.

THE MOVANT,
ARIF A. DURRANI

By


William M. Bloss
JACOBS, GRUDBERG, BELT & DOW, P.C.
350 Orange St.
P. O. Box 606
New Haven, CT 06503
(203) 772-3100
His Attorney

CERTIFICATION

I hereby certify that a copy of the Movant's First Request
for Production of Documents was mailed first class, postage
prepaid to:

Holly Fitzsimmons
Assistant United States Attorney
915 Lafayette Blvd.
Bridgeport, CT 06604

this 20th day of June, 1991.



William M. Bloss